

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No. 2:21-CV-463-JRG
	)	
SAMSUNG ELECTRONICS CO., LTD.,	)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS AMERICA,	)	
INC., SAMSUNG SEMICONDUCTOR,	)	
INC.,	)	
	)	
Defendants.	)	

---

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST INC.'S  
OPPOSITION TO SAMSUNG'S OMNIBUS MOTIONS *IN LIMINE***

**I, Jason G. Sheasby, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist’s Opposition to Samsung’s Omnibus Motions *In Limine*. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is true and correct copy of the Order re Motions For Summary Judgment and Related Applications filed in Netlist v. Samsung, Case No. 20-cv-00993, Docket No. 186.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of the deposition transcript of Chuck Hong, taken December 16, 2022.

4. Attached as **Exhibit 3** is a true and correct excerpted copy of the Expert Rebuttal Report of Paul K. Meyer, dated January 31, 2023.

5. Attached as **Exhibit 4** is a true and correct excerpted copy of the Corrected Expert Report of David Kennedy, dated January 20, 2023.

6. Attached as **Exhibit 5** is a true and correct copy of Exhibit 22 to the Jung Bae Lee deposition, taken February 2, 2023.

7. Attached as **Exhibit 6** is a true and correct excerpted copy of the deposition of Jung Bae Lee, taken February 2, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of a translated document produced in this action, Bates numbered NL107763 – 68.

9. Attached as **Exhibit 8** is a true and correct copy of a translated document produced in this action, Bates numbered NL070531 – 37.

10. Attached as **Exhibit 9** is a true and correct copy of a translated document

produced in this action, Bates numbered NL108731 – 62.

11. Attached as **Exhibit 10** is a true and correct excerpted copy of the deposition transcript of Paul Myer, taken March 1, 2023.

12. Attached as **Exhibit 11** is a true and correct excerpted copy of the deposition transcript of Dongjun Choi, taken December 7, 2022.

13. Attached as **Exhibit 12** is true and correct copy of Netlist's Amended Trial Witness List, dated March 3, 2023.

14. Attached as **Exhibit 13** is a true and correct excerpted copy of the deposition transcript of Indong Kim, taken December 8, 2022.

15. Attached as **Exhibit 14** is a true and correct copy of Netlist's Second Notice of Deposition of Defendants Pursuant to Rule 30(b)(6) dated September 27, 2022.

16. Attached as **Exhibit 15** is a true and correct copy of an email from counsel for Samsung to counsel for Netlist dated October 21, 2022.

17. Attached as **Exhibit 16** is a true and correct copy of an email from counsel for Samsung to counsel for Netlist dated November 30, 2022.

18. Attached as **Exhibit 17** is a true and correct excerpted copy of the deposition transcript of Junseon Yoon, taken December 21, 2022.

19. Attached as **Exhibit 18** is true and correct copy of the Order re Motions For Entry of Judgment filed in Netlist v. Samsung, Case No. 20-cv-00993, Docket No. 305.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 20, 2023, in Los Angeles, California.

By /s/ Jason G. Sheasby  
Jason G. Sheasby